



Wisconsin Department of Veterans Affairs

We Honor Your Service

“Please review and sign...”
**Wisconsin State Approving Agency’s
Catalog Approval Process**

Andrew Martin, Education Consultant





Who Makes Up the Wisconsin SAA?

April Heim

Bureau of Programs and Services Chief & SAA Director

Larry Graves

Education Consultant

Andrew Martin

Education Consultant

Sebastian Walters

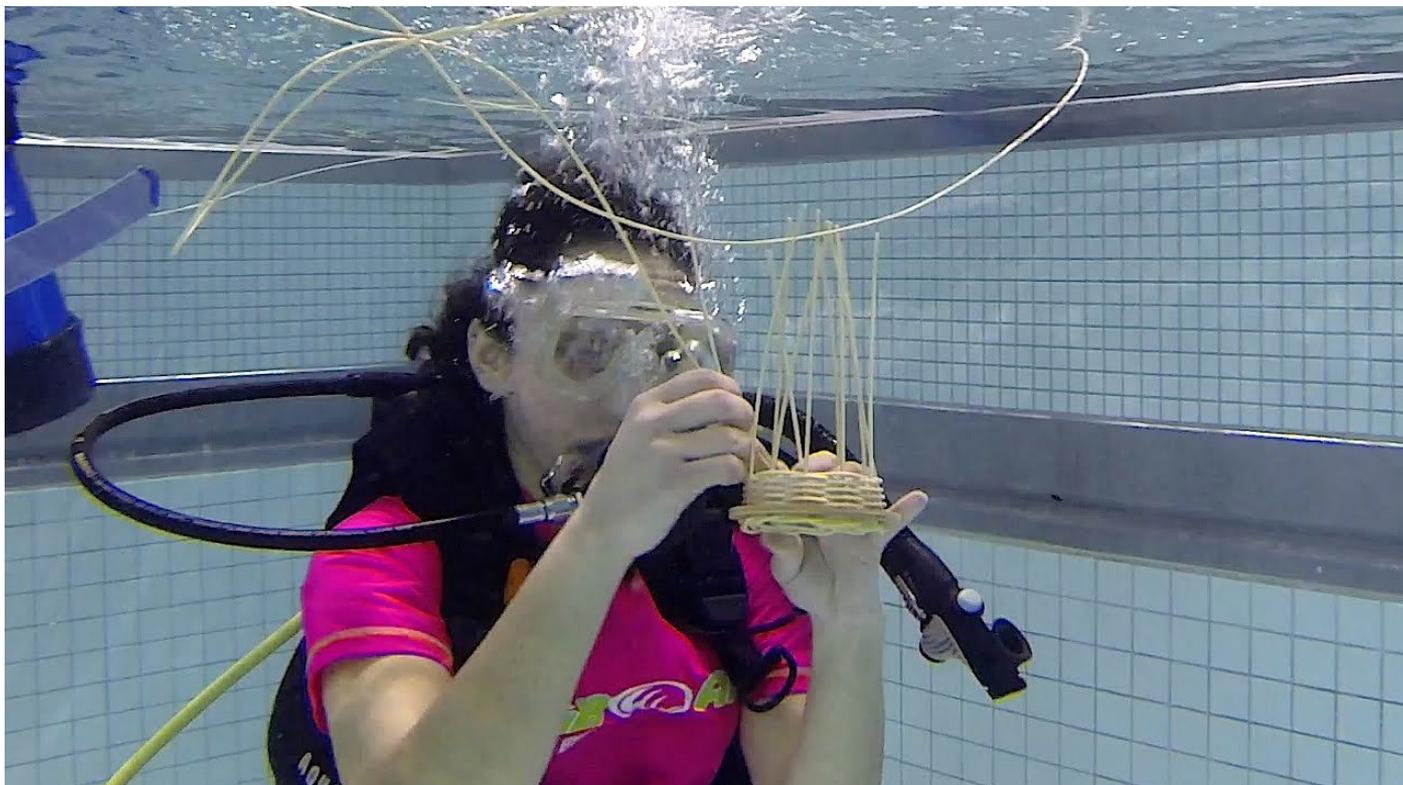
Veterans Program Specialist



Wisconsin Department of Veterans Affairs

We Honor Your Service

What Types of Facilities & Programs Can the SAA Approve?





Institute of Higher Learning Programs (IHL)	Non-College Degree Programs (NCD)	Apprenticeship/On-The-Job Training (APP/OJT)
<p>Universities, colleges, community colleges, technical and/or business schools, offering instruction at the post-secondary level, which leads to an associate (or higher) degree.</p>	<p>Certificate or diploma programs which do not lead to a standard college degree but have a verified vocational or educational objective. NCD programs are measured in either credit or clock-hours.</p>	<p>Industry based training in which a person earns an entry-level wage while training for a designated skill or trade in a goal-oriented program. APPs are registered apprentices with DWD while OJTs are not registered.</p>
Licensing/Certification Exam (LACAS)	Preparatory Courses for Licensure & Certification (Prep)	Flight (FLT)
<p>State agencies or private entities where an exam is required to award a state license or industry certifications.</p>	<p>Courses that do not lead to a vocational objective but prepare students for taking a licensure or certification exam.</p>	<p>Part 141 approved private flight programs necessary for the attainment of a recognized vocational objective in the field of aviation.</p>

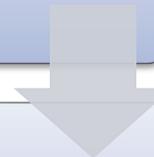


How Are Facility and Course Approval Rules Determined?

United States Code (U.S.C.)

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Code of Federal Regulations (CFR)

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VA Policy & Procedural Advisories



Federal Laws for IHL & NCD Approvals

- **38 U.S.C. 3672** - Covers accredited standard college degree programs offered at a public or not-for-profit proprietary educational institution that is accredited by an agency or association recognized for the purpose by the Secretary of Education
- **38 U.S.C. 3675** - Covers accredited programs of education (including non-degree programs) not covered by 38 USC 3672
- **38 U.S.C. 3676** - Covers programs of education offered by public or private, profit or nonprofit, educational institutions not covered by 38 USC 3672 or 38 USC 3675



Federal Regulations for IHL & NCD Approval

- **38 CFR 21.4253** (Accredited Programs) - Provides detail for programs of education approved under 38 U.S.C. 367(2/5)
- **38 CFR 21.4254** (Nonaccredited Programs) - Provides detail for programs of education approved under 38 U.S.C. 3676
- **38 CFR 21.4265** Practical training approved as institutional training or on-job training – medical & dental, residencies
- **38 CFR § 21.4233 (a)** Cooperative Courses - Phases of school instruction alternated with training in a business or industrial establishment

At various times, the Federal VA will issue Policy or Procedural Advisories and Memos clarifying U.S.C and CFR



38 U.S. Code § 3675 - Approval of accredited courses

[U.S. Code](#) [Notes](#)

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(a)

(1) A State approving agency, or the Secretary when acting in the role of a State approving agency, may approve accredited programs (including non-degree accredited programs) not covered by [section 3672 of this title](#) when—

(A) such courses have been accredited and approved by a nationally recognized accrediting agency or association;

(B) such courses are conducted under the Act of February 23, 1917 ([20 U.S.C. 11](#) et seq.); ^[1]

(C) such courses are accepted by the State department of education for credit for a teacher's certificate or a teacher's degree; or

(D) such courses are approved by the State as meeting the requirement of regulations prescribed by the Secretary of Health and Human Services under sections 1819(f)(2)(A)(i) and 1919(f)(2)(A)(i) of the [Social Security Act](#) ([42 U.S.C. 1395i-3\(f\)\(2\)\(A\)\(i\)](#) and [1396r\(f\)\(2\)\(A\)\(i\)](#)).

(2)

(A) For the purposes of this chapter, the Secretary of Education shall publish a list of nationally recognized accrediting agencies and associations which that Secretary determines to be reliable authority as to the quality of training offered by an educational institution.

(B) Except as provided in [section 3672\(e\) of this title](#), a State approving agency may utilize the accreditation of any accrediting association or agency listed pursuant to subparagraph (A) of this paragraph for approval of courses specifically accredited and approved by such accrediting association or agency.

(3)

(A) An educational institution shall submit an application for approval of courses to the appropriate State approving agency. In making application for approval, the institution (other than an elementary school or secondary school) shall transmit to the State approving agency copies of its catalog or bulletin which must be certified as true and correct in content and policy by an authorized representative of the institution.

(B) Each catalog or bulletin transmitted by an institution under subparagraph (A) of this paragraph shall—

(i) state with specificity the requirements of the institution with respect to graduation;

(ii) include the information required under paragraphs (6) and (7) of [section 3676\(b\) of this title](#); and

(iii) include any attendance standards of the institution, if the institution has and enforces such standards.



38 CFR § 21.4253 - Accredited courses.

[CFR](#) [Table of Popular Names](#)

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§ 21.4253 Accredited courses.

(a) **General.** A course may be approved as an accredited course if it meets one of the following requirements:

- (1) The course has been accredited and approved by a nationally recognized accrediting agency or association. "Candidate for accreditation" status is not a basis for approval of a course as accredited.
- (2) Credit for such course is approved by the [State](#) department of education for credit toward a high school diploma.
- (3) The course is conducted under the Act of February 23, 1917 ([20 U.S.C. 11](#) et seq.).
- (4) The course is accepted by the [State](#) department of education for credit for a teacher's certificate or teacher's degree.
- (5) The course is approved by the [State](#) as meeting the requirement of regulations prescribed by the [Secretary](#) of Health and Human Services under sections 1819(f)(2)(A)(i) and 1919(f)(2)(A)(i) of the [Social Security Act](#) ([42 U.S.C. 1395i-3\(f\)\(2\)\(A\)\(i\)](#) and [1396r\(f\)\(2\)\(A\)\(i\)](#)).

(Authority: [38 U.S.C. 3675\(a\)](#))

(b) **Course objective.** Any curriculum offered by an educational institution which is a member of one of the nationally recognized accrediting agencies or associations and which leads to a degree, diploma, or certificate will be accepted as an accredited course when approved as such by the [State](#) approving agency. Any curriculum accredited by one of the specialized nationally recognized accrediting agencies or associations and which leads to a degree, diploma, or certificate will also be accepted as an accredited course when approved as such by the [State](#) approving agency. Approval of the individual subjects, required or elective, which are designated as a part of a degree curriculum will not be necessary. Such approval may include noncredit subjects that are prescribed as a required part of the curriculum. The course objective may be educational (high school diploma or a standard college degree) or it may be vocational or professional (an occupation).

(c) **Accrediting agencies.** A nationally recognized accrediting agency or association is one that appears on the list published by the [Secretary](#) of Education as required by [38 U.S.C. 3675\(a\)](#). The [State](#) approving agencies may use the accreditation of these accrediting agencies or associations for approval of the course specifically accredited and approved by the agency or association.

(d) **School qualification.** A school desiring to enroll [veterans](#) or [eligible persons](#) in accredited courses will make application for approval of such courses to the [State](#) approving agency. The [State](#) approving agency may approve the application of the school when the school and its accredited courses are found to have met the following [criteria](#) and additional reasonable [criteria](#) established by the [State](#) approving agency:

- (1) The institution (other than an elementary or secondary school) has submitted to the [State](#) approving agency copies of its catalog or bulletin which are certified as true and correct in content and policy by an authorized representative, and the publication shall:
 - (i) [State](#) with specificity the requirements of the institution with respect to graduation;
 - (ii) Include institution policy and regulations relative to standards of progress required of the student by the institution (this policy will define the grading system of the institution, the minimum grades considered satisfactory, conditions for interruption for unsatisfactory grades or progress, a description of the probationary period, if any, allowed by the institution, conditions of reentrance for those students dismissed for unsatisfactory progress, and a statement regarding progress records kept by the institution and furnished the student);
 - (iii) Include institution policy and regulations relating to student conduct and conditions for dismissal for unsatisfactory conduct; and
 - (iv) Include any [attendance](#) standards of the institution if the institution has and enforces such standards.

(Authority: [38 U.S.C. 3675\(a\)](#), [3676\(b\)](#))

(2) Adequate records are kept by the school to show the progress of each [veteran](#) or [eligible person](#). The records must be sufficient to show continued [pursuit](#) at the rate for which enrolled and the progress being made. They must include final grade in each subject for each [term](#), [quarter](#), or [semester](#); record of withdrawal from any subject to include the last date of [attendance](#) for a resident course; and record of reenrollment in subjects from which there was a withdrawal; and may include such records as [attendance](#) for resident courses, periodic grades and examination results.

(3) The school maintains a written record of previous education and training of the [veteran](#) or [eligible person](#) which clearly indicates that appropriate credit has been given by the school for previous education and training, with the training period shortened proportionately. The record must be cumulative in that the results of each [enrollment period](#) (term, [quarter](#) or semester) must be included so that it shows each subject undertaken and the final result, *i.e.*, passed, failed, incomplete or withdrawn.

(Authority: [38 U.S.C. 3675\(b\)](#))



Policy Advisory: Section 1015 of Public Law (P.L.) 116-315 and approval requirements for accredited institutions under 38 USC § 3672 and 38 USC § 3675.

October 26, 2021

Background: On January 5, 2021, P.L. 116-315 was signed into law. Section 1015 amended chapter 36 of title 38 USC §3675 and 38 USC 3672(b)(2)(A) to require accredited institutions to be eligible for participation in the Federal Student Aid program under title IV of the Higher Education Act of 1965 in order to be eligible to receive GI Bill® funds.

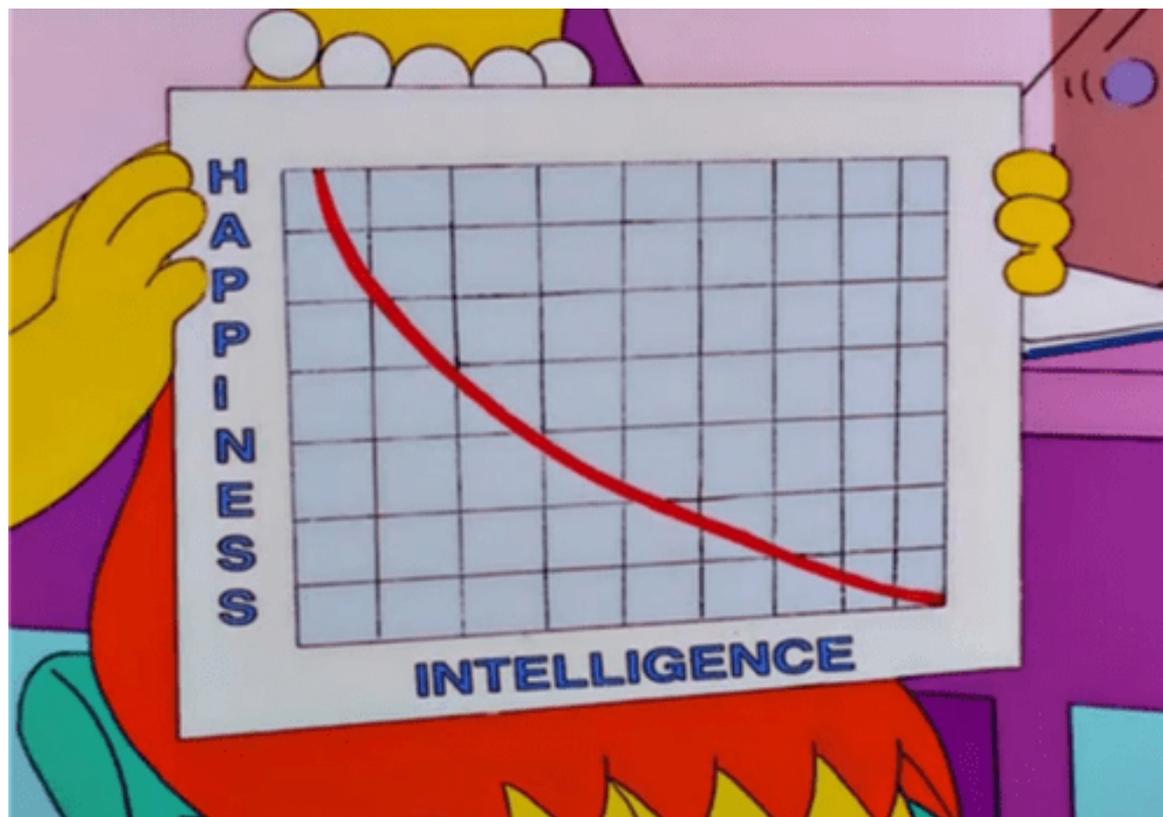
Purpose: To provide clarification of VA's interpretation of an accredited educational institution that is approved and participates in a program under title IV of the Higher Education Act of 1965.

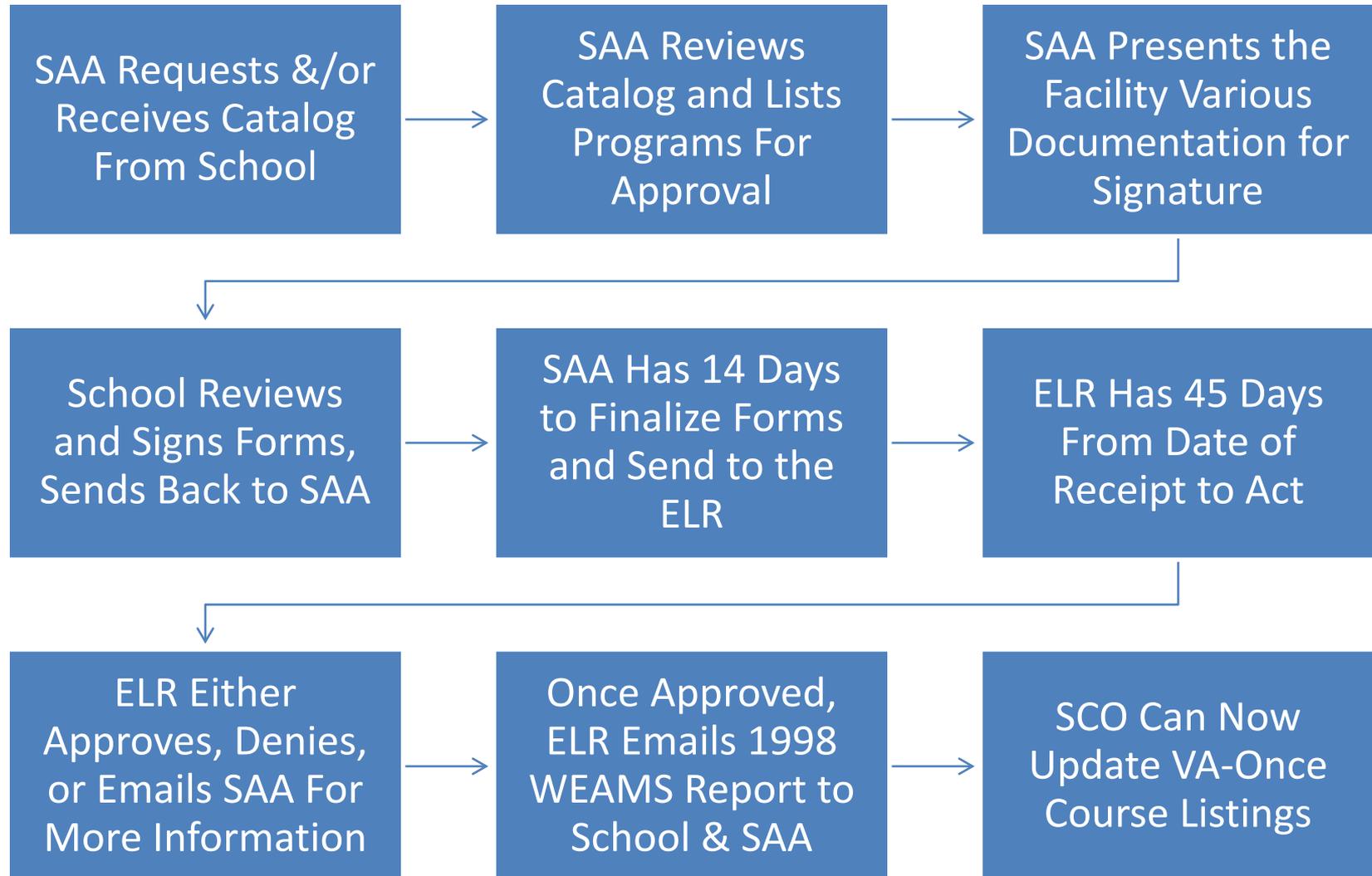
Issue: Participation in a program under title IV of the Higher Education Act (HEA) of 1965, can take various forms. An institution can participate, where the institution does not receive any title IV funding, rather processes student loan deferments of previous title IV funding. Other levels of participation include institutions that are fully engaged in title IV and receive, administer, and distribute title IV funding to eligible students.

Discussion/Answer: Department of Education regulation, Title 34 Code of Federal Regulation (CFR) §668.14(a)(1) states: "An institution may participate in any title IV, HEA program, other than the [Leveraging Educational Assistance Partnership (LEAP)] and [National Early Intervention Scholarship and Partnership (NEISP)] programs, only if the institution enters into a written program participation agreement with the Secretary [of Education], on a form approved by the Secretary [of Education]. A program participation agreement conditions the initial and continued participation of an eligible institution in any title IV, HEA program upon compliance with the provisions of this part, the individual program regulations, and any additional conditions specified in the program participation agreement that the Secretary [of Education] requires the institution to meet."

As expressly stated in the regulation above, a program participation agreement is a requirement for an institution to participate in any title IV program. Keeping in-line with

The IHL & NCD Program Approval Process in Wisconsin







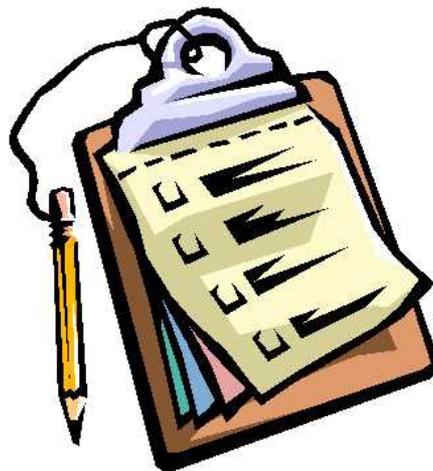
What Does the SAA “DO” Actually?

- The SAA education consultants will review your catalog for all approvable courses that are listed in it
- We will then list the programs on the “Approval Certificate.” This is the official form we send to the VA which will be used to generate the VA 22-1998 list in WEAMS
- Next, we will review your catalog, or student handbook, or other documentation we have either requested or found online to fill out WDVA Form 2902
- Once we have filled out the Approval Certificate, 2902 Form, and collected any other documentation, we will then submit materials to you as an SCO for review and signature



WDVA Form 2902

This checklist ensures that your facility's catalog and program approvals meet all VA approval criteria for federal VA education benefits. It also documents where information about your facility is available to anyone who requests it.





WISCONSIN
DVA
VETERANS FORWARD
Wisconsin Department
of Veterans Affairs

WISCONSIN STATE APPROVING AGENCY
P.O. Box 7843, Madison, WI 53707-7843
(608) 261-8771 | 1-800-WIS-VETS (947-8387)

CATALOG APPROVAL CHECKLIST (SAA)



Title 38, U.S. Code requires all new or revised academic programs offered by institutions under the jurisdiction of the Wisconsin State Approving Agency (SAA) to be approved by the SAA *prior to certification of enrollment* of eligible students to the VA for federal GI Bill® benefits.

This checklist identifies elements required for approval and their location in your catalog and/or other documents. Please list the publication page(s) that address each required element. Attach a complete list of academic programs by exact degree title and major and/or exact title of all non-degree programs (such as diplomas and certificates) for which you request approval. If submissions are in hardcopy format, please send two copies. If submissions are in electronic format, please send in only one copy.

Note: Regulations for accredited schools are cited in 38 CFR 21.4253; non-accredited schools in 38 CFR 21.4254.

Name of Institution: _____

Name/Title of Person Completing this Form: _____

PUBLICATIONS

Catalog materials containing required information consist of the following publications and documents **identified by title, volume number, and date of publication (DO NOT SUBMIT EXPIRED OR INCOMPLETE MATERIALS):**

1. _____
2. _____
3. _____
4. _____
5. _____
6. _____

REQUIRED CONTENT FOR SCHOOL CATALOG	PUBLICATION # FROM LIST ABOVE (List the specific page(s) the required item may be found.)				
	1	2	3	4	5(+)
I. School Information					
a. Names of school officials and administrators	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Entrance requirements for admission to your institution	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. <u>Accredited schools only:</u> Description of accreditations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. <u>Non-accredited schools only:</u> Name of governing body, corporate owner, and board members (if any)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. <u>Non-accredited schools only:</u> Names of school faculty	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. <u>Non-accredited schools only:</u> Description of available space, facilities, and equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
II. Standards of Academic Progress (SAP)					
a. Description of institution's grading system	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Minimum grades considered satisfactory	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Grades or G.P.A. and other requirements for graduation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Conditions for which a student would be suspended or dismissed for unsatisfactory grades or academic progress	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

REQUIRED CONTENT FOR SCHOOL CATALOG

	PUBLICATION # FROM LIST ABOVE				
	1	2	3	4	5(+)
e. Conditions under which a student, suspended or dismissed for unsatisfactory grades or progress, would be allowed to re-enter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Description of institution's academic probationary period (if any)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Statement regarding academic records maintained (minimum of 3 years) and furnished to the student (grades, transcripts and programs completed)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Stated policy regarding attendance standards (<u>Non-accredited schools must have an attendance policy which includes:</u> 1. excused/unexcused absences; 2. tardiness; 3. excessive absences; 4. make-up work; and 5. interruption for unsatisfactory attendance.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Policy on granting credit for prior education and training (school must obtain a written record of prior education and training, [including military training,] granting of credit when appropriate, and shortening of program accordingly)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
III. Student Conduct Standards					
a. Institutional rules or regulations governing student conduct	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conditions under which a student would be suspended or dismissed for unacceptable conduct	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Conditions under which a student suspended or dismissed for unsatisfactory conduct would be allowed to re-enter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IV. Finances					
a. Schedule of tuition, fees, and other charges	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Institution's refund policy (<u>Non-accredited schools must have a pro rata refund policy not to exceed the total charges that the number of days or hours of program completed bears to the total length of the program. The non-refundable portion of registration fees will not exceed \$10.00 [38 CFR 21.4255].</u>)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
V. Curriculum					
a. Curriculum outline and descriptions for academic programs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Descriptions of individual courses or subjects required for each program	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Descriptions of basic skills, remedial or deficiency subjects, including English as a Second Language (ESL), high school completion options (GED, HSED, WCBHSED, etc.), and other special or alternative learning subjects certified to the VA (if any)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Academic calendar, including starting and ending dates of each term or semester, vacations, and holidays	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



REQUIRED CONTENT FOR SCHOOL CATALOG

PUBLICATION # FROM LIST ABOVE

1 2 3 4 5(+)

VI. Placement Assistance

a. Disclosure of type and extent of placement or employment counseling services provided to graduates (if any)

Form with 5 columns for publication numbers and a shaded box for each.

VII. CERTIFIED STATEMENTS

Please read the following statements and initial attesting that your facility meets and agrees to adhere with the following provisions of Title 38 United States Code:

OFFICIAL'S INITIALS

a. The institution ensures any statements made in the school catalog or other official publications (e.g. graduation rates, employment percentage, placement rate percentage, expected salaries, etc.) can be supported or substantiated, and if it cannot, it will be considered a misleading or erroneous practice by the SAA. Failure to correct such practices can result in actions up to and including disapproval. (CFR 38 U.S.C. § 3696(a); 38 CFR § 21.4252.)

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b. The facility has adequate equipment and instructional space (type, quality, and quantity) and complies with local city, county, municipal, state, and federal regulations including fire, building, accessibility, health, and safety regulations. (38 U.S.C. § 3676(c)(2).)

Shaded box for initials

c. The institution's owners, administrators, directors, and instructors are of good reputation and character. (38 U.S.C. § 3675-§ 3676.)

Shaded box for initials

d. The educational and experience qualifications of directors, administrators, and instructors are adequate, and instructors can provide training of good quality. (38 U.S.C. § 3675-§ 3676.)

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e. The institution, once approved for receipt of benefits, must make student records and accounts, among others, available to authorized Government representatives to be copied and/or removed from the school for the express purpose of the compliance activity. (38 CFR § 21.4209)

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f. The institution does not and will not provide any commission, bonus, or other incentive payment based directly or indirectly on success in securing enrollment or financial aid to any persons or entities engaged in any student recruiting or admissions activities or in making decisions regarding the award of student financial assistance. (38 U.S.C § 3696)

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g. In accordance with 38 U.S.C. § 3679, the State Approving Agency may disapprove a course or facility if they determine the facility pays inducements, including any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item having a monetary value of more than a de minimis amount, to any individual or entity, or its agents including third party lead generators or marketing firms other than salaries paid to employees or fees paid to contractors in conformity with all applicable laws for the purpose of securing enrollments of covered individuals or obtaining access to educational assistance under this title, with the exception of scholarships, grants, and tuition reductions provided by the educational institution.

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h. In accordance with 38 U.S.C. § 3679, prior to the enrollment of a student, the institution provides the individual with a form that contains information personalized to the individual that describes the estimated total cost of the course, including tuition, fees, books, supplies, and any other additional costs; and if applicable, an estimate of the cost for living expenses for students, the amount of the costs covered by VA Education Benefits, any financial aid offered by the institution, and an estimate of the amount of student loan debt the student would have upon graduation.

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i. In accordance with 38 U.S.C. § 3679, prior to the enrollment of a student, the institution provides the individual with information regarding graduation rates; if available, job-placement rates for graduates of the course; information regarding the acceptance of institution transfer of credits, including military credits; any conditions or additional requirements, including training, experience, or examinations, required to obtain the license, certification, or approval for which the course of education is designed to provide preparation; and other information to facilitate comparison by the individual of aid packages offered by different educational institutions.

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j. Accredited Schools Only – In accordance with 38 U.S.C. § 3679, the facility acknowledges the State Approving Agency may disapprove an individual course or facility if they determine the facility is the subject of a negative action, including sanction or probation, made by the accrediting agency that accredits the institution.

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VIII. SUMMARY OF ITEMS TO BE SUBMITTED

The following list summarizes the items that must be submitted as part of an institution's application for approval under Title 38, U.S. Code. The SAA has authority to require the following information based on U.S. Code and Federal Regulations.

- A. A copy of this completed application form, WDVA 2902, which includes initialed certified statements.
B. A current copy of your Course Catalog and associated documentation used to complete this form.
C. All schools required to be approved by the Educational Approval Program (EAP) or Department of Safety and Professional Services (DSPS) must submit a copy of their current certificate of authorization/approval.
D. A signed copy of the Principles of Excellence – School Self Report, acknowledging the facility has been made aware of and adheres to these principles for all students utilizing VA Education Benefits.
E. Copies of advertising or recruiting materials your facility has used over the last year. You must include a copy of any advertising directed at veterans or mentioning the GI Bill®.
F. Accredited Schools Only – Submit documentation showing your current affirmation of accreditation.
G. Any other documentation requested by the SAA which substantiates the contents of this form or fulfills the requirements of approval per Title 38, U.S. Code.

I certify the official institution documents and certified statements; itemized above; or any other documents listed in a separate attachment to this checklist, to be true and correct in content and policy as a designated certifying official of this institution for Federal G.I. Bill benefits.

Signature of Certifying Official: _____ Date: _____

Print Name of Certifying Official: _____

Effective Date of Course Catalog: _____



You've Signed the Forms and the SAA Sent the Approval Package to the VA. Now What?

- The ELR has 45 days to act on the approval package we submit to them
 - We have been VERY lucky that our ELR is responsive, and we typically have a response in a few weeks
- The ELR will review the “ELR Checklist” to determine if we have submitted and reviewed all the appropriate materials
- If they have questions, they will ask us for clarification or more documentation to substantiate our findings
- If they approve the package, they will email the facility and SAA. If not, the SAA receives a formal denial letter



The ELR Checklist

[ACCREDITED SCHOOLS 38 C.F.R. § 21.4253](#)

NAME AND ADDRESS OF FACILITY:	<p>Instructions: In order to accept the approval package submitted by the State Approving Agency, all required sections must be checked "yes." For those checked "no" comments must be placed for reason for development or return. All required areas are those that must be checked "yes" or "no." Those that are "N/A" may only be checked on non filled "N/A" boxes. N/A sections greyed out may not be checked N/A as they are requirements for approval acceptance. ELR will need to develop or return approval if required areas cannot be answered as "yes." Please note: a miscellaneous change, revision, or addendum to a catalog such as a program addition or minor change to an already approved and accepted catalog in which an ancillary action will take place, does not need a full checklist review. Key terms used throughout this document are shown below: 24 months - a reference to a re-evaluation or reapproval every 24 months is made throughout this document in reference to the requirement for SAA to re-evaluate schools, facilities, and programs minimally, every 24 months, and this review must include review of licensure, accreditation, potential misleading or erroneous practices, and all requirements as outlined in Title 38 ETI - Educational Training Institute Original - is used to identify ETIs that have not not been previously approved and are new and also used for initial approvals Re-approval - is used to identify those approvals that are submitted after an original approval for submissions of approval of subsequent catalogs, policy changes, or any other modifications of the approval</p>
FACILITY CODE:	
DATE OF APPROVAL NOTICE:	
DATE RECEIVED:	

THE FOLLOWING ITEMS MUST BE INCLUDED IN THE NOTICE OF APPROVAL LETTER:	Yes	No	N/A	Required Per M22-4 As Follows:	Required Per 38 C.F.R. As Follows:	Required Per SAA Cooperative Agreement (CA) As Follows:	Comments On Development Or Return
	Did the SAA provide a copy of the Notice of Approval letter to include the date of the letter? (SAA, upon determining an educational training institution (ETI) meets all approval requirements will send a Notice of Approval letter to the facility and upload to Salesforce.)				M22-4 Part IX 2.17a	C.F.R. § 21.4258(b)(1)(i)	CA Appendix 1 Paragraph D
Does Notice of Approval letter submitted by SAA include complete name and physical address of facility?				M22-4 Part IX 2.17a	C.F.R. § 21.4258(b)(1)(ii)	CA Appendix 1 Paragraph D	
Does the Notice of Approval letter submitted by SAA include legal authority and conditions of approval and refer specifically to the approved catalog or				M22-4 Part IX 2.17a	C.F.R. § 21.4258(b)(1)(iii)	CA Appendix 1 Paragraph D	
Does the Notice of Approval letter submitted by SAA include the effective date of approval?				M22-4 Part IX 2.17a, M22-4 Part IX 2.11	C.F.R. § 21.4258(b)(1)(i)	CA Appendix 1 Paragraph D	
Does the Notice of Approval letter submitted by SAA include a list of the name of each approved program and the type of instruction offered either on the letter or as an attachment to the letter?				M22-4 Part IX 2.17a	C.F.R. § 21.4258(b)(1)(iv)	CA Appendix 1 Paragraph D	
Does the Notice of Approval submitted by SAA, if applicable, include the enrollment limitations? (ex. max number of students authorized, student-teacher ratio)					C.F.R. § 21.4258(b)(1)(v)	CA Appendix 1 Paragraph D	
Does the Notice of Approval submitted by SAA include the signature of the responsible SAA official?				M22-4 Part IX 2.17a	C.F.R. § 21.4258(b)(1)(vi)	CA Appendix 1 Paragraph D	
ADDITION TO THE NOTICE OF APPROVAL LETTER, DOES THE APPROVAL CHECKET CONTAIN THE FOLLOWING:	Yes	No	N/A	Required Per M22-4 As Follows:	Required Per C.F.R. As Follows:	Required Per SAA Cooperative Agreement (CA) As Follows:	Comments On Development Or Return
VA Form 22-8794? (Designation of School Certifying Official(s)) -only required on original approvals and not on re-approvals.				M22-4 Part IX 2.17a	C.F.R. § 21.4203(a)(1), C.F.R. § 21.4266(a)(2)	CA Appendix 1 Paragraph D	

A Few Slides About Common & Not Always Common Situations You Should Know About





April 5th, 2022 – VA Procedural Advisory

As a result of the 2021 Isakson and Roe legislation, Section 1020 added written limitations an institution can undertake in advertising, sales, and enrollment practices:

- Misleading Statements
- Misrepresentation
- Substantial Misrepresentation
- Limitations on Commissions, bonuses, and other inventive payments
- Aggressive Enrollment Practices
- Aggressive Recruiting
- Lead Generating Activity



Lead Generating Activity

Lead Generating Activity is defined by the VA as:

“Any internal persons or 3rd party entity receiving any compensation directly or indirectly based upon initiating GI Bill® beneficiary interest to secure GI Bill® enrollments, course or program completions by a student, or financial aid in an education and training institution with at least one approved GI Bill® program.”

- Does this mean I cannot recruit veterans?
 - *NO!* What it does mean is that you should be **very** careful about how your institution pays recruiting agencies and what you are “recruiting”



The Words “GI Bill[®]” and Advertising

If you choose to use the words “GI Bill” in advertising, the trademark symbol “[®]” should be placed at the upper right corner of the trademarked phrase in the most prominent place at first usage; such as the title of a brochure, form, or the very top of a Web page and the following trademark attribution notice must be prominently visible: “GI Bill[®] is a registered trademark of the U.S. Department of Veterans Affairs (VA).”

More information about education benefits offered by VA is available at the official U.S. government website:

[https://www.benefits.va.gov/GIBILL/Trademark Terms of Use .asp](https://www.benefits.va.gov/GIBILL/Trademark%20Terms%20of%20Use.asp)



Occasionally Seen Program Approval Issues

- Pre-professional programs, and other programs which do not lead to a terminal degree cannot be approved
 - We can only approve programs which lead to a *professional or vocational objective*
 - A *professional or vocational objective* is one that leads to an occupation. It may include educational objectives essential to prepare for the chosen occupation
- We CAN approve teaching programs which just lead to a licensure (more common at the graduate level)
 - §3675(a)(1)(c) allows us to approve courses accepted by DPI for credit for a teacher's license
 - * Note: §3675 = accredited institutions



Occasionally Seen Program Approval Issues

- Students pursuing an individualized degree must have an education plan approved by the Dean's Office or Registrar's Office prior to VA certification.
 - If selected for a compliance survey, this will be reviewed to ensure courses pursued are in line with the degree plan and a "professional or vocational objective."
- "Teach-Out"
 - We list programs as "teach-out" for one to two years if they are not in the most recent catalog we are reviewing
 - Please look at these courses closely. If you know a course isn't being discontinued, we can use a website info sheet in lieu of a catalog listing for documentation.



Continuing Education Courses

- Programs in a “Continuing Education” Program are almost always not approvable under the “IHL/NCD” type of facility program approval
 - Approvable programs must lead to a “professional or vocational objective,” and the VA almost always sees courses as part of continuing education as not meeting this definition
- So, are these courses completely un-approvable?
 - Not necessarily! The new method of approval, Preparatory Courses, do allow for these types of courses to potentially be approved



Preparatory Courses – The Next Frontier...

- What are Prep Courses?
 - “Courses for a licensing or certification test that is required or used to enter into, maintain, or advance in employment in a predetermined and identified vocation or profession”
 - Veterans are **reimbursed** for these courses following successful completion – no housing paid, no certifying by the SCO of start/end dates & tuition
- Thing you’re probably thinking – *“Should I send you all my courses now? I have a few courses this applies to!”*
 - Please hold off on this until you’re approached by a vet
- The VA is still working out a **LOT** of implementation issues

Questions?

